

**REQUIRED STATEMENT  
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Alberta D. Mack-Lee Case No. 19 B 13688 Chapter 13

All Cases: Moving Creditor Kia Motors Finance Company Date Case Filed 5/13/19

Nature of Relief Sought:  Lift Stay  Annul Stay  Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 8/7/19

Chapter 7:  No-Asset Report Filed on \_\_\_\_\_  
 No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral
  - a.  Home
  - b.  Car Year, Make, and Model 2019 Kia Sportage
  - c.  Other (describe) \_\_\_\_\_
2. Balance Owed as of Petition Date \$ 45,990.29 as of 9/25/19  
Total of all other Liens against Collateral \$ \_\_\_\_\_
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 34,600.00
5. Default
  - a.  Pre-Petition Default  
Number of months .7 Amount \$ 550.40
  - b.  Post-Petition Default
    - i.  On direct payments to the moving creditor  
Number of months 4 Amount \$ 3,124.16 w/ next due 10/1
    - ii.  On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
6. Other Allegations
  - a.  Lack of Adequate Protection § 362(d)(1)
    - i.  No insurance
    - ii.  Taxes unpaid Amount \$ \_\_\_\_\_
    - iii.  Rapidly depreciating asset
    - iv.  Other (describe) \_\_\_\_\_
  - b.  No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
  - c.  Other “Cause” § 362(d)(1)
    - i.  Bad Faith (describe) \_\_\_\_\_
    - ii.  Multiple Filings
    - iii.  Other (describe) \_\_\_\_\_
  - d. Debtor’s Statement of Intention regarding the Collateral
    - i.  Reaffirm
    - ii.  Redeem
    - iii.  Surrender
    - iv.  No Statement of Intention Filed

Date: 10/1/19 /s/ Cari A. Kauffman  
Counsel for Movant